Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Investigation of Alascom, Inc.	)	CC Docket No. 95-182
Tariff FCC No. 11	)	

REPLY COMMENTS OF ALASCOM, INC.

Charles R. Naftalin
Jonathan Epstein
Holland & Knight LLP
2099 Pennsylvania Avenue, NW
Suite 100
Washington, DC 20006-6801
Tel: (202) 457-7040
Fax: (202) 955-5564
Attorneys for Alascom, Inc.

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Alascom, Inc. ("Alascom"), by its attorneys, hereby submits its Reply Comments ("Reply") in the above-captioned proceeding.[1] The Public Notice invited interested parties to provide their current positions in this proceeding by identifying any relevant changes, and to offer their views as to how the Commission should initiate an investigation of Alascom's Tariff No. 11 after a period of approximately eight years since this matter was first docketed. In this Reply, Alascom offers well-crafted procedures by which the Commission may resolve efficiently all issues of lawfulness related to Tariff No. 11, protect Alascom's essential confidentiality interests, and bring this protracted proceeding to an equitable conclusion for all parties with cognizable interests in the proceeding.

I. Summary and Background

More than ten years ago, in the Alaska Joint Board proceeding the Commission ordered Alascom to prepare its Cost Allocation Plan ("CAP") as the rate

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[1] The Reply is submitted pursuant to *Public Notice, Further Comment Requested in Investigation of Alascom, Inc. Tariff FCC No. 11,* DA 03-3508 (rel. October 31, 2003) ("Public Notice") and responds to the Public Notice, the Statement of Current Position of ACS-LD and Petition to Suspend and Investigate Transmittal No. 1281, filed by ACS Long Distance ("ACS-LD"), on December 10, 2003 ("ACS-LD Comments"), and the Comments of General Communication, Inc. ("GCI") filed December 15, 2003 ("GCI Comments").

making model to generate annual Common Carrier Services ("CCS") rates by which Alascom would provide interstate transport and switching services on its network within Alaska and between Alaska and the lower 48 states.[2] The CAP was, and still is, a unique rate making scheme in which Alascom is required to establish hundreds of location-specific costs of service throughout its network in order to offer transport, switching and Alaska-CONUS rates for each of its Bush rate zone, in which Alascom experienced no facilities-based competition for switched public service due it its *de jure* monopoly (now repealed) known as the "Bush Policy, "[3] and its non-Bush rate zone, in which it faced actual facilities-based competition.[4]

As might be expected, development of the unique and complex CAP proved difficult. Alascom retained Deloitte and Touche to develop the CAP and the Commission's staff exercised substantial oversight over the process, including

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[2] *Integration of Rates and Services for Provision of Communications by Authorized Common Carriers between the Contiguous States and Alaska, Hawaii, Puerto Rico, and the Virgin Islands, CC Docket 83-1376,* Final Recommend Decision, 9 FCC Rcd 2197 (Jt. Bd. 1993) *(Final Recommended Decision); Integration of Rates and Services for Provision of Communications by Authorized Common Carriers between the Contiguous States and Alaska, Hawaii, Puerto Rico, and the Virgin Islands*, CC Docket No. 83-1376, Memorandum Opinion & Order, 9 FCC Rcd 3023 (1994) (*Market Structure Order*).

[3] A substantial exception to the Bush Policy has existed since 1996, when GCI was granted authority to deploy competitive facilities in 50 Bush locations. *Petition of General Communications, Inc. for Partial Waiver of the Bush Earth Station Policy*, Memorandum Opinion & Order, 11 FCC Rcd 2535 (rel. Jan. 30, 1996). Those locations represent more that 60% of total Bush traffic. See AT&T Corp. and Alascom Inc. Petition for Elimination of Conditions, p. 11, CC Docket 00-46 (filed Mar. 10, 2000).

[4] For example, the CAP model uses Cost Location Codes (CLOCs) at approximately 900 locations which are used to designate costs and expenses for specific geographic locations or for specific function. *See e.g.*, Alascom Transmittal No. 1281 (Description & Justification) (filed Nov. 25, 2003) (providing of summary of the calculations used to determine rates under the CAP). Alascom, Inc. Petition for Waiver, p.3, WC Docket No. 03-18 (filed Jan. 17, 2003) (Declaration of John C. Klick and Julie A. Murphy) (public version) (discussing the complex way in which costs are assigned, attributed, or allocated under the CAP).

substantive review of the CAP computer model and paper descriptions.[5] Thus, a first version of the CAP was rejected by the staff as insufficient,[6] and then after revisions directed by the staff, the staff affirmatively approved the CAP.[7] That approval was affirmed on reconsideration.[8] The Commission-approved version of the CAP has been used to make every set of Tariff No. 11 rates that have taken effect.

Every Tariff No. 11 rate revision has been subject to challenge, primarily by Alascom's competitor GCI, and made a part of the instant proceeding. GCI's interest is only as a competitor as it has never been a direct customer of Alascom's Tariff No. 11.[9] It has been Alascom's well-founded position from inception that the CAP and the uniquely granular data in it are so unusually competitively sensitive that its competitors should not be given access to it. GCI is the only competitor that has sought such access, having been denied it initially by the Commission[10] and is

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[5] *Alascom, Inc., Cost Allocation Plan for the Separation of Bush and Non-Bush Costs*, 10 FCC Rcd 4963, Order, ¶¶ 10-20 (rel. May 4, 1995) (providing a detailed analysis of the elements of the original CAP proposed by Alascom, noting the specific deficiencies and setting forth the basis for its rejection of this original CAP).

[6] *Id.* at ¶ 2.

[7] *Alascom, Inc., Cost Allocation Plan for the Separation of Bush and Non-Bush Costs*, 10 FCC Rcd 9823, Order, rel. Sep.11, 1995) (*First CAP Approval Order).*

[8] *Alascom, Inc., Cost Allocation Plan for the Separation of Bush and Non-Bush Costs*, 12 FCC Rcd 1991, Memorandum Opinion and Order on Reconsideration and Order Approving Cost Allocation Plan (rel. Feb. 10, 1997) (*Second CAP Approval Order*). This Order rejected GCI's petition for reconsideration regarding approval of the CAP and approved a revised CAP submitted in November 13, 1995, to reclassify as non-Bush, 19 locations previously classified as Bush. It also required Alascom to modify one factor in the CAP allocating satellite costs.

[9] GCI does act as the billing agent for several of Alascom's Tariff No. 11 customers.

[10] *General Communication, Inc. on Requests for Inspection of Records*, Memorandum Opinion & Order, 11 FCC Rcd 17143, FCC 96-191 (rel. Apr. 30, 1996); *General Communications, Inc. on Requests for Inspection of Records,* 12 FCC Rcd 8484, FCC 97-184 (rel. June 26, 1997).

now in a similar renewed dispute.[11] Of the six customers, including AT&T receiving Tariff No. 11 services, the only customer participating in this proceeding is ACS-LD. Its comments have not been inflammatory.

II. Alascom's Statement of Position

The Public Notice (p. 2) invites the parties to provide their current positions, and to identify changes in circumstances relevant to this proceeding. Alascom asserts that a tariff investigation is unnecessary and wasteful because it accomplished rate making pursuant to the directions of the Commission, including the use of the CAP that had been expressly approved by the Commission. Indeed, that approval process should render Tariff No. 11 rate making lawful because it was based upon a prescribed procedure.[12] The only exception to this view is that certain,

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[11] GCI filed its FOIA request on February 26, 2003, seeking a wide range of CAP information. The FCC determined that the requested information is confidential but proposed to allow the release subject to a protective order. *See* Letter from Joseph T. Hall Assistant Bureau Chief, Management, Wireline Competition Bureau to Timothy R. Hughes, Drinker, Biddle & Reath, FOIA Request Control No. 2003-208 (WCB Apr. 10, 2003) (FOIA Response). Both GCI and Alascom filed applications for review of this decision, which are still pending. The parties have agreed on the terms of a protective order that could be used, if upon review (and possible judicial appeal by one or both parties) it is determined that some or all of this information may be released to GCI. *See General Communications, Inc. On Request for Inspection of Records*, Protective Order, FOIA Control No. 2003-208 (rel. July 10, 2003).

[12] Applying the "filed rate doctrine" Alascom believes that: (i) the CAP as approved by the Commission in 1995 and in 1997 is "lawful"; (ii) the actual tariffed rates filed by Alascom over the years using the approved CAP were the "legal" rates (*i.e.*, the rates Alascom was obligated to charge and customers obligated to pay); (iii) as the Commission has already ruled on the "lawfulness" of the CAP, if the Commission determines that Alascom correctly used the CAP (*i.e.*, it used the correct model and reasonable data inputs for any given year), the rates for that year would be reasonable and "lawful." *See Arizona Grocery Co. v. Atchson Topeka & Santa Fe RailwayCo.*, 284 U.S. 370, 52 S. Ct. 183 (1932). *See also Implementation of Section 402(b)(1)(A) of the Telecommunications Act of 1996*, Report and Order, ¶¶ 11, 19-23, 12 FCC Rd 2170, FCC 97-23 (rel. Jan. 31, 1997) (discussing "legal" versus "lawful" rates). This is consistent with the *Second CAP Approval Order*, ¶ 40, which states that the CAP and revised CAP were reviewed and found in compliance with the Commission's Rules, as opposed to the projected costs and demand figures in particular tariff filings that were subject to the tariff investigation proceeding.

isolated, errors have taken place that Alascom shall make clear to the Commission and shall rectify with affected customers.[13]

Substantial changes in circumstances also should be recognized in this proceeding, which did not prevail when it was initiated. First, when the entire CCS rate model, including the CAP, and what eventually became Tariff No. 11, was devised by the Commission, it was, in large measure, intended to replace the historic AT&T and Alascom Joint Service Arrangement with a tariff-based structure so that AT&T and Alascom would be independent. AT&T would purchase services from Alascom for minimum periods of time and amounts on terms made available to other carriers.[14] That structure was obsolete from inception because in August 1995, before Tariff No. 11 first went into effect, AT&T acquired Alascom and has operated it ever since as a wholly-owned subsidiary.[15] It is likely that the Commission never would have ordered the draconian Tariff No. 11 arrangement if AT&T had acquired Alascom prior to or during the deliberations of the Alaska Joint Board.

Second, the only policy basis that legally supported the imposition of the dominant carrier regulation of Alascom's Tariff No. 11 services, and its unique rate making system, was the existence of the Bush Policy, and the theoretical chance that Alascom could have subsidized its competitive non-Bush services with its Bush

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[13] *See Ex Parte* Report, CC Docket 95-182 (filed Dec. 4, 2003) (reporting a meeting between Alascom and FCC staff regarding inadvertent errors in Transmittal No. 1278).

[14] *See Final Recommended Decision* at ¶ 9; *Market Structure Order* at ¶ 6.

[15] *Application of Alascom, Inc., AT&T Corporation and Pacific Telecom, Inc. for Transfer of Control of Alascom Inc. to AT&T Corporation,* Order and Authorization, 11 FCC Rcd 732 FCC 95-334 (rel. Aug. 2, 1995).

services which were subject to a *de jure* facilities monopoly. Alascom advocated for the repeal of the Bush policy for nearly four years,[16] relief that has been supported by both the State of Alaska[17] and by GCI.[18] The Commission ultimately repealed the Bush Policy in 2003.[19]

Third, competition in the Alaska market has grown dramatically, indeed exponentially, since 1993 when the Alaska Joint Board issued its Final Recommended Decision. For example, Alascom now holds a minority of the Alaska telecommunications market, GCI exceeds Alascom's share of the market, and many other substantial competitors serve in Alaska.[20] Even assuming that Tariff No. 11 were warranted more than ten years ago, similar concerns about competition now would be irrational. GCI, among others, have prospered.

Finally, GCI has never been a direct customer of Tariff No. 11 service and therefore it lacks standing to complain about the rates, cannot be aggrieved by them, and could not be the beneficiary of refunds.[21]

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[16] *See, e.g.*, AT&T Corp. and Alascom Inc. Petition for Elimination of Conditions, CC Docket 00-46 (filed Mar. 10, 2000) (urging the Commission to repeal the "Bush Policy").

[17] Comments of the Regulatory Commission of Alaska, IB Docket No. 02-30 (filed June 27, 2002) (supporting elimination of the Bush policy). The Regulatory Commission of Alaska had repealed its own regulations restricting intrastate competition in the Bush. *See Consideration of the Reform of Intrastate Interexchange Telecommunication Market Structure and Regulations in Alaska*, Docket R-98-1, Order No. 6 (RCA, Nov. 20, 2000).

[18] *See, e.g.,* Comments of General Communications Inc. IB Docket No. 02-30 (filed July 1, 2002) (supporting elimination of the Bush policy).

[19] *Policy for Licensing Domestic Satellite Earth Stations in the Bush Communities of Alaska,* IB Docket No. 02-30, Report and Order, FCC 03-197 (rel. Aug. 12, 2003).

[20] *See* AT&T Corp. and Alascom Inc. Petition for Elimination of Conditions, pp. 5-10, CC Docket 00-46 (filed Mar. 10, 2000) (providing detailed statistics on increase in competition).

[21] *See Panatronic USA v. AT&T Corp.*, 28 F.3d 840 (9th Cir. 2002) (construing § 203 of the Communications Act as allowing a cause of action only for on customers "covered by" (*i.e.,* taking

Accordingly, any actions taken in this proceeding should be tempered by the fact that Tariff No. 11 should never have been put into place, that GCI has no valid current interest in it and that today it is unsupportable on a legal, factual or policy basis.

III. Alascom's Proposed Procedures

The Public Notice clearly signals the Commission's interest in concluding this proceeding. In that regard, Alascom suggests the following.

The Commission should direct Alascom to provide the staff with the CAP model (*i.e.*, the computer model) and data used for each of the rate revisions made during the history of Tariff No. 11, holding those submissions and data in confidence. The staff should then analyze those materials and make initial determinations, per transmittal, whether Alascom properly adhered to the CAP and correctly supplied adequate data for it. Alascom would make its rate making personnel and/or outside consultants available to the staff to answer specific questions.[22]

This procedure accommodates substantial concerns. First, it will permit the staff to fulfill the Commission's duty to investigate the lawfulness of the Tariff No. 11 rates, which is the fundamental purpose of this proceeding. Alascom has never objected to making its confidential information available to the Commission, indeed it did so when asked in 1994 and 1995. There is no statutory obligation that

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service under) the tariff at issue). Further, GCI in its comments and in recent oppositions does not allege any harm caused to it.

[22] This would be consistent with appropriate *ex parte* requirements.

GCI, or other of Alascom's competitors, be given access to its Tariff No. 11 information in this proceeding. The duty to investigate lies squarely with the Commission and GCI should not be permitted to intrude on the Commission's jurisdiction and expertise.

Second, following this course will permit the investigation to move forward while GCI's rights to obtain any such information are being considered by the Commission and while Alascom exhausts its remedies, as necessary, to protect its confidential information.[23]

Third, it will provide the Commission the opportunity to resolve this proceeding without the prospect of irreparably harming any current competitive balance between Alascom and its competitors. Even in the event that the staff could not resolve all possible aspects of this matter, at least it could narrow the scope of the case and the issues to be addressed.

Finally, Commission analysis of Alascom's information would be an essential guide to its decision about Alascom's confidentiality rights and the harm that would be caused if any of the information is released to GCI, even under the terms of a stringent protective order. To date, the Commission has not addressed the expert testimony about that harm with any meaningful detail.[24] That failing could be

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[23] *See e.g.*, 47 C.F.R. § 0.461(i)(4) (setting forth procedure for seeking a judicial stay of release of records).

[24] *See* Alascom Application for Review, FOIA Control No. 2003-208, pp. 3-10 (filed Apr. 24, 2003) (noting that the FCC failed to address the testimony of Alascom's independent consultants regarding the "uniquely detailed and granular" nature of the CAP and related information, "the specific examples the experts identified of unusual competitive harm likely to result if the Confidential Information is release to GCI", and the "one of-a-kind" nature of the CAP that differentiates it from other tariffs).

rectified by actual Commission analysis of Alascom's information and any subsequent decision likely would be more equitable to all parties.

This would be the most efficient approach, and the one that would conserve the resources of the Commission and parties.

IV. Alascom's Reply to ACS-LD and GCI Comments

GCI's comments are inconsistent with the context of this proceeding, which should guide its procedures. Fundamentally, in order to determine whether Alascom's Tariff No. 11 rates have been lawful, the Commission should examine two issues per transmittal. They are: (1) did Alascom apply the CAP as it was ordered to do (*i.e.*, did the computer program reasonably implement the CAP) and (2) were the data Alascom entered into the model reasonably appropriate to the rate making process Alascom had been ordered to conduct? For every Tariff No. 11 transmittal for which the Commission is able to reach an affirmative determination on both issues, then such rates must be found to be reasonable and lawful. Obviously, Alascom validly could not be ordered to refund rates produced in compliance with Commission orders. On the other hand, in the event that the Commission finds itself unable to achieve those two affirmative determinations per transmittal, then it should identify missing data or failures in the rate making process, solicit additional information if necessary, and identify the scope of harm, if any, caused to relevant customers. At that point, the possibility of liability for refunds could be addressed.

This clear, fundamental understanding of the purpose of the instant proceeding thus shows that much of GCI's comments are inappropriate. GCI calls for twenty-five categories of document productions and interrogatories, spanning six pages of description. (GCI Comments, pp. 13-18) These GCI demands obviously are not tailored to resolve the Tariff No. 11 investigation. Instead, GCI insists upon unlimited access to Alascom Tariff No. 11 information, including thought processes, planning, and privileged communications, many of them overtly unrelated to the actual Tariff No. 11 rates that were on file and in effect. GCI also pursues all confidential information related to Tariff No. 11 even though GCI was never a customer and has no valid interest in the data.

GCI claims that the "Cost Allocation Plan process is "woefully inadequate" (GCI Comments, p. 1), that it is a "black box" (GCI Comments, p. 10), that the switching rates must be wrong (GCI Comments, p. 18), and implying that the Commission never reviewed the "cost model" in approving the CAP. (GCI Comments, p. 3). GCI's comments blur the terms "CAP," "CAP model" and "cost model" to, in effect, challenge not only the data Alascom used in any given year to produce tariffed rates (*e.g.*, demand data, costs, etc.), but apparently also the underlying CAP itself. As previously demonstrated, the CAP was prepared with considerable input from the Bureau, Bureau approval and Commission affirmance. Alascom believes the Bureau's economists had an opportunity to review the CAP

model (*i.e.*, the CAP computer program) populated with data as part of the record leading to the *Second CAP Approval Order* in 1997.[25]

GCI also claims, as it has in the past, that the tariff investigation must be concluded before the Commission should consider any prospective action relevant to Tariff No. 11 or the Alaska market. (GCI Comments, p. 6) Of course, GCI does not explain why an investigation of past rates must be concluded before prospective action may be considered.

Although unstated by GCI, there is a logical connection between its insistence that it have broad access to Alascom information, that the CAP was not approved by the Commission and GCI's principal criticism of the CAP – that rates for Bush and non-Bush should be the same.[26] Despite its years of complaints, GCI would have good reason to view Tariff No. 11 as competitively helpful to its market position. By engaging the regulatory process to force Alascom to maintain non-competitive CCS rates, which are the rates charged to other carriers, GCI is the beneficiary of lucrative intercarrier arrangements. For example, in its most recent annual report to the Securities and Exchange Commission, for the year ending December 31, 2002 ("GCI Form 10-K"), GCI stated:

> Revenues attributed to WorldCom's message telephone traffic from these agreements (excluding private line and other revenues) in 2002, 2001 and 2000 totaled $54.7 million, $44.8 million, and $47.9 million, or 14.9%, 12.6%, and 16.4% of total revenues, respectively. (GCI 10-K. p. 23)

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[25] *See Second CAP Approval Order*, ¶ 30 (noting that the Commission did not "rely" on the cost model in approving the revised CAP).

[26] *See* GCI Comments, pp. 18-20.

> Services provided pursuant to the contract with Sprint resulted in message telephone service revenues (excluding private line and other revenues) in 2002, 2001 and 2000 of approximately $23.5 million, $29.7 million, and $20.1 million, or approximately 6.4%, 8.3%, and 6.9% of total revenues, respectively. (*Id.*)

The reason why GCI is intransient in insisting that Tariff No. 11 remain in effect for the foreseeable future is its own profitability. As disclosed in its 10-K, GCI depends upon intercarrier contracts with WorldCom and Sprint for substantial portions of its total revenues, 21.3% for 2002. GCI's desire to shelter under the Tariff No. 11 rate umbrella explains GCI's interest in simultaneously attacking and preserving Tariff No. 11.[27] If, as GCI's advocates, Alascom were forced to modify the CAP to use the same rates for both Bush and Non-Bush services, then presumably non-Bush rates would increase and Bush rates decrease – making Alascom less competitive in the non-Bush (*i.e.*, the more commercially lucrative portion of the Alaska market). For years, Alascom has sought the opportunity to eliminate Tariff No. 11 and only offer competitive services. A more efficient Alascom carrier-to-carrier service offering than Tariff No. 11 could lead to GCI's loss of large customers or force GCI to reduce its carrier-to-carriers rates, leading to reduced revenues. Such an increase in competition from Alascom is a prospect that GCI seeks to avoid or delay for as long as possible.

ACS-LD invites the Commission to eliminate Tariff No. 11 before reaching the lawfulness of past rates. (ACS-LD Comments, p. 2) ACS-LD also suggests that

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[27] In addition, GCI's pursuit of Alascom information for years in which GCI has no possible refund claim demonstrates its desire for Alascom proprietary information, and not for "investigation." Moreover, the Tariff No. 11 rate umbrella is likely especially beneficial to GCI's profitability in locations classified as "Bush" under Tariff No. 11, but in which GCI maintains competing facilities.

Tariff No. 11 be taken "off-the-table" in areas of Alaska that are subject to competition. (ACS-LD, pp. 2-3).

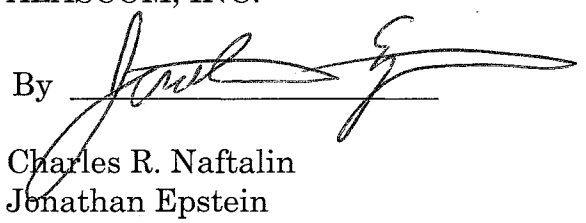
ACS-LD makes an important point. Alascom faces facilities-based competition for more than ninety percent of Alaskan access lines. Due to the repeal of the Bush Policy, the terms of competitive entry in Alaska are the same as in the other 49 states. Alascom should be relieved of its Tariff No. 11 obligations immediately because they have no valid basis.

V. Conclusion

Therefore, the Commission should direct Alascom to provide the staff with the CAP and data for each of the Tariff No. 11 rate revisions, receiving them in confidence and withholding them from public inspection. The staff then could determine whether, for each rate revision, Alascom used the CAP model it was required to use and employed reasonably appropriate data, with any questions of lawfulness resolved for every rate revision affirmatively determined to have complied with the Commission's orders. This process would protect Alascom's confidential information from unwarranted intrusion by GCI while permitting the Commission to conduct, and either conclude or substantially narrow, the investigation of Tariff No. 11.

Respectfully submitted,

ALASCOM, INC.

By 

Charles R. Naftalin
Jonathan Epstein
Holland & Knight LLP
2099 Pennsylvania Avenue, NW
Suite 100
Washington, DC 20006-6801
(202) 457-7040

January 9, 2004

Its Attorneys

CERTIFICATE OF SERVICE

I, Judy Norris, a legal secretary in the law firm of Holland & Knight LLP, do hereby certify that on January 9, 2004, a copy of the foregoing Reply Comments of Alascom, Inc. were sent via electronic mail and/or U.S. mail, where indicated, to the following:

William Maher
Chief, Wireline Competition Bureau
Federal Communications Commission
Room 5-C450
445 12th Street, SW
Washington, DC 20554
William.Maher@fcc.gov

Tamara Preiss
Chief, Pricing Policy Division
Wireline Competition Bureau
Federal Communications Commission
Room 5-A223
445 12th Street, SW
Washington, DC 20554
Tamara.Preiss@fcc.gov

Deena Shetler
Deputy Division Chief
Pricing Policy Division
Wireline Competition Bureau
Federal Communications Commission
Room 5-A221
445 12th Street, SW
Washington, DC 20554
Deena.Shetler@fcc.gov

Julie Saulnier
Pricing Policy Division
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
Julie.Saulnier@fcc.gov

Tina Pidgeon*
General Communications, Inc.
1130 17th Street, N.W., Suite 410
Washington, D.C. 20036

Elizabeth A. Ross
Birch, Horton, Bittner and Cherot
1150 Connecticut Avenue, N.W.
Suite 1200
Washington, D.C. 20036
eross@dc.bhb.com

Donn T. Wonnell, Esq.
2944 Crows Nest Circle
Anchorage, AK 99515
dtwonnell@aol.com

Qualex International
445 12th Street, S.W.
Washington, D.C. 20554
qualexint@aol.com

Judy Norris